



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	A K R 0 6 A C 7 2	1 6 1 0 0 5	~	R	2
Remarks					
21					
66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 1 0 69	70	71	72	73	74 75
80					

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
WestRock Anchorage Recycling 6161 Rosewood Street Anchorage, AK 99518	3:00PM 10/05/16	04/01/2015
	Exit Time/Date	Permit Expiration Date
	4:00PM 10/05/16	03/31/2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Randy Virgin, General Manager (907) 562-2267 randy.virgin@westrock.com	Formally RockTenn NAICS 423930 - Recyclable Material Merchant Wholesalers	
Name, Address of Responsible Official/Title/Phone and Fax Number	ADEC MSGP Inspection	
Randy Virgin, General Manager (907) 562-2267 WestRock Anchorage Recycling 6161 Rosewood Street Anchorage, AK 99518	Lat: 61.165029 Long: -149.861153	
Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
• • • • •	_____
• • • • •	_____
• • • • •	_____
• • • • •	_____

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Klemesrud	EPA R10/OCE/MIRE 206-553-5068	10/07/2016
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	EPA/R10/OCE MIRE 30855	2/14/17

ICIS.
10-12-16
JH Brown

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A —	State (Contractor)	O —	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B —	EPA (Contractor)	P —	Other Inspectors, State (Specify in Remarks columns)
E —	Corps of Engineers	R —	EPA Regional Inspector
J —	Joint EPA/State Inspectors—EPA Lead	S —	State Inspector
L —	Local Health Department (State)	T —	Joint State/EPA Inspectors—State lead
N —	NEIC Inspectors		

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

***Alaska Pollutant Discharge Elimination System
(APDES) Inspection Report***

***WestRock Anchorage Recycling Center
APDES # AKR06AC72***

Prepared by:

***Jon Klemesrud
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit***

Table of Contents

- I. Facility Information**
- II. Inspection Information**
- III. Permit Information**
- IV. Inspection Chronology**
- V. Background**
- VI. Facility Review**
- VII. Records Review**
- VIII. Areas of Concern**
 - A. Good Housekeeping**
 - B. Quarterly Visual Assessment**
- IX. Closing Conference**

Attachments

- A. SWPPP Site Map**
- B. Photo Log**
- C. WestRock Recycling and ADEC Monitoring Email**

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Randy Virgin or from observations made during the inspection.]

I. Facility Information

Facility Name: WestRock Anchorage Recycling Center
(WestRock Recycling)

Facility Contacts: Randy Virgin – General Manager
(907) 562-2267
randy.virgin@westrock.com

Facility Location: 6161 Rosewood Street
Anchorage, AK 99518

GPS: N 61.165029 W -149.861153

Mailing Address: 6161 Rosewood Street
Anchorage, AK 99518

II. Inspection Information

Inspection Date: October 5, 2016

Inspectors: Jon Klemesrud, Inspector
EPA Region 10, OCE / MIRE
(206) 553-5068

Arrival Time: 03:00 PM
Departure Time: 04:00 PM

Weather Condition: Cloudy

Receiving waters: Campbell Creek

Purpose: Document the facility's compliance with the Alaska Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP) and Section 402 of the Clean Water Act (CWA).

III. Inspection Chronology

This was an unannounced inspection. Prior to arriving at the facility on October 5, 2016, I called Randy Virgin, General Manager of WestRock Recycling in Anchorage. I introduced myself and he and I agreed on an inspection that afternoon. We discussed the inspection as well as logistics to the site.

Upon arriving to WestRock Recycling, I identified myself as an EPA inspector, presented my inspector credentials and provided Mr. Virgin with my business card. I informed him that the purpose of the visit was to conduct a compliance inspection under the facility's 2015 MSGP and the CWA.

The EPA inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the inspection. The inspection included a facility walk-through and a records review.

The records review was followed by a closing conference where I discussed compliance-related concerns with Mr. Virgin.

IV. Background

WestRock Recycling is a community drop-off site for residential and commercial non-hazardous household recycling. The facility processes drop-off recyclable items within their warehouse and processing center. According to the facility's Stormwater Pollution Prevention Plan (SWPPP) the estimated area of industrial activity exposed to stormwater is approximately 2.3 acres and according to Mr. Virgin the facility has 10 employees.

Coverage under the Alaska 2015 MSGP began August 14, 2016. (Seven days after ADEC acknowledgment of the completed Notice of Intent). The facility was previously covered under the 2008 MSGP AKR05DB33 and was last inspected by ADEC on February 8, 2012.

Subpart N – Sector N of the MSGP for “Scrap Recycling Facilities” applies to this facility, however only for permit requirements associated with source-separated recycling facilities. See Section 11.N.2 of the MSGP for limitations on coverage in regards to the sector specific requirements.

According to Mr. Virgin the facility changed its name from RockTenn CP, LLC to WestRock on June 30, 2015.

V. Facility Review

WestRock Recycling consists of a paved pad with various outdoor storage/sorting containers for local residents to drop-off non-hazardous recyclables. Adjacent to the pad is the WestRock Recycling warehouse and processing center where the recyclables are crushed and bailed. Once bailed the recyclables are placed in trailers and trucked off-site for further processing.

Interior to the WestRock Recycling facility, the paved pad is sloped so that stormwater flows to the only outfall (Outfall #1) prior to entering a stormwater ditch. According to the facility, the stormwater ditch flows north, then west, and connects to Campbell Creek.

According to the facility, sheet flow from the small parking area and the public drop-off bins goes across Rosewood Street and enters a stormwater ditch west of the street. See Attachment A, SWPPP Site Map.

Industrial activities at the WestRock Recycling facility include receiving, sorting, recycled metal, paper and plastics. The facility also has a small fueling station for their forklift operations. According to the SWPPP, pollutants associated with the activities include: Metals (Zn, Al, Pb, Fe), oil and grease, and TSS. Liquids are not accepted at the facility for recycling.

Best Management Practices (BMPs) at the facility include some covered bins/containers, annual "stormwater and environmental compliance training," routine inspections and sweeping. Mr. Virgin stated that incoming recyclables are inspected to ensure only clean recyclables are accepted. The facility has covered dumpsters for the disposal of non-recyclable garbage. The diesel fuel tank has a locking collar to help prevent spillage.

During the facility tour I examined all areas occupied by WestRock Recycling including the drop-off areas the processing area, bailing area, fueling area and the stormwater Outfall #1. See Attachment C, Photos #1-6.

VI. Records Review

At the time of the inspection, the file review included the following records:

- **NPDES Permit** – At the time of the inspection Mr. Virgin provided me with the current copy of the MSGP.
- **Stormwater Pollution Prevention Plan (SWPPP)** – At the time of the inspection I requested to view a copy of the latest SWPPP. The SWPPP had the preparation date July 1, 2015. Mr. Virgin wasn't aware of any recent updates.
- **Monthly Inspections** – At the time of the inspection I reviewed monthly inspection checklists completed by Mr. Virgin. The inspections are titled "monthly preventative maintenance and good housekeeping." See Attachment B, Photo #7.
- **2015/2016 Annual Report** – At the time of the inspection I reviewed the 2015 Annual Report which included a comprehensive site inspection. The report was submitted to ADEC on June 8, 2016.
- **Annual Stormwater Training Log** – At the time of the inspection I reviewed the facility's annual training log. The most recent training was on August 17, 2016. The training objectives included: reviewing PPE safety policies, the stormwater permit, compliance, and environmental best practices. All 10 employees were present.

VII. Areas of Concern

Observations during the inspection included the identification of two areas of concern. These areas of concern are described as follows:

A. Good Housekeeping

Section 4.2.2 of the permit states: "a permittee must keep clean all exposed areas that are potential sources of pollutants, including but not limited to: using such measures as sweeping at regular intervals, keeping materials orderly and labeled and storing materials in appropriate containers.

At the time of the inspection, I observed multiple employees sweeping and cleaning up debris, however, debris was observed away from the recyclable storage piles and in many areas within the yard. There were also smaller pieces of recyclable materials near Outfall #1. See Attachment C, Photo #3-4.

B. Quarterly Visual Assessment

Section 6.2.1 of the permit describes the quarterly visual assessment requirements as well as documentation requirements. "Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall (except as noted in Part 6.2.3) and conduct a visual assessment of each of these samples."

The facility did not have a documented quarterly visual monitoring sampling event at the time of inspection.

Mr. Virgin explained to me that he had contacted ADEC regarding sampling and he was under the impression that since the facility only accepted source-separated materials the facility wasn't required to sample. Mr. Virgin provided me with an email from ADEC Stormwater & Wetlands Section Manager Jim Rypkema, regarding this topic. See Attachment D, WestRock Recycling and ADEC Monitoring Email.

I explained to Mr. Virgin that the quarterly visual monitoring is separate from the sector specific benchmark monitoring and we went over the permit language. Mr. Virgin stated that he must have interpreted the language wrong and will begin conducting the quarterly visual monitoring as required by the permit.

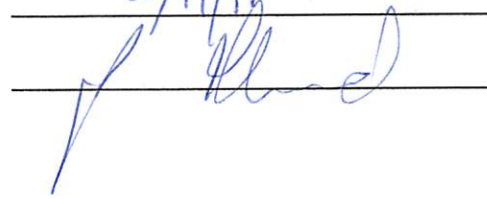
VIII. Closing Conference

A closing conference was held with Mr. Virgin to discuss my inspection observations and concerns. I then thanked him for his time and cooperation with the inspection.

Report Completion Date:

02/14/13

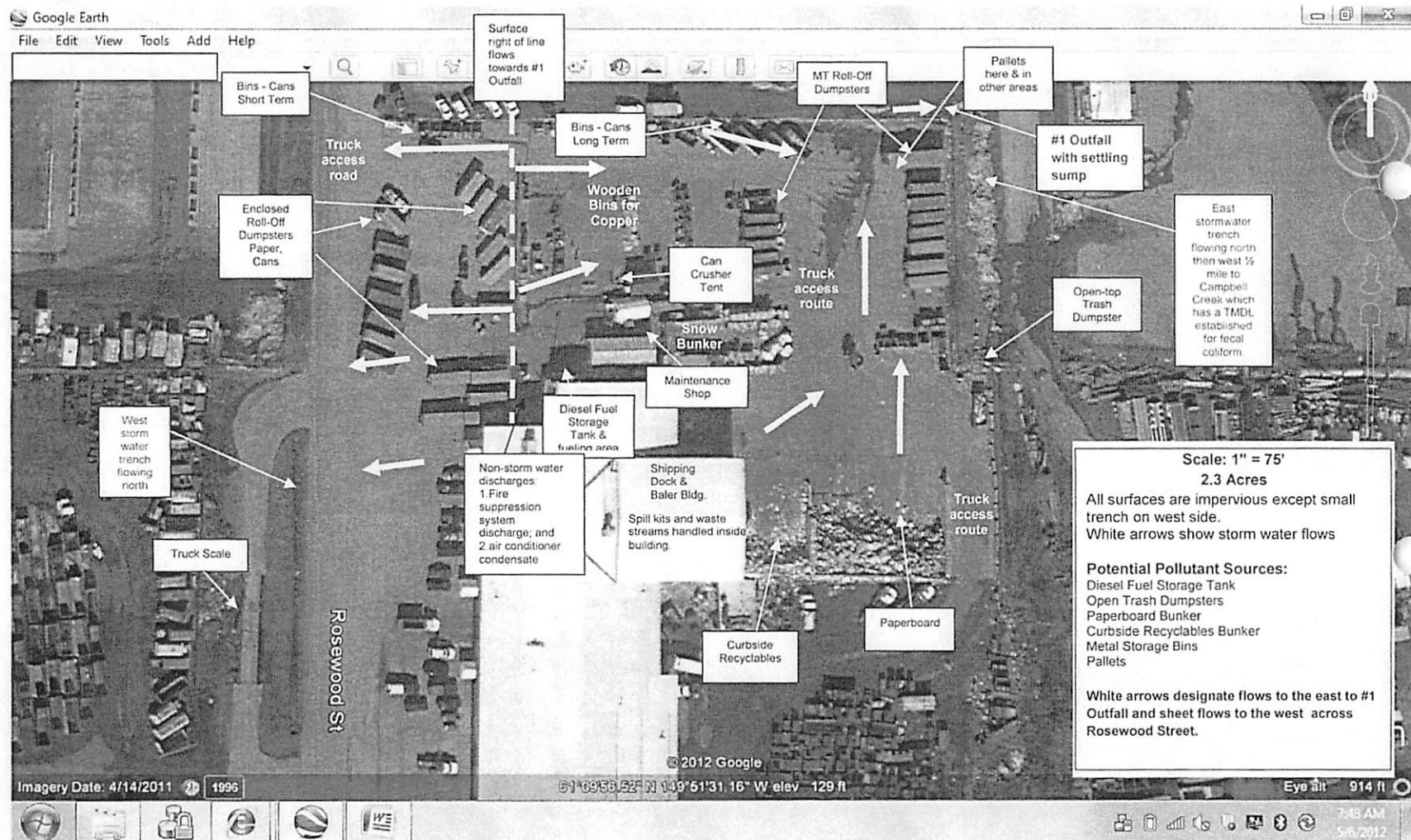
Lead Inspector Signature:

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a series of loops and a long horizontal stroke, written across two horizontal lines.

Attachment A

SWPPP Site Map

Attachment B: SWPPP Site Map - RockTenn CP, LLC Anchorage, Alaska Recycling Plant



Attachment B

Photo Log

Photographs were taken by Jon Klemesrud on 10/05/2016

Photo Log – WestRock Anchorage Recycling Facility.

Photo #:01

Description: Facing south, photo of the 500-gallon diesel tank onsite. Camera Photo DSCN1171.



Photo #:02

Description: Facing south, photo taken near the entrance, showing a portion of the recyclable drop-off areas. Camera Photo DSCN1172.



Photo #:03

Description: Facing east, photo of the catch basin identified as Outfall #1. Camera Photo DSCN1173.



Photo #:04

Description: Facing north near the processing facility, view of the truck access route and some sorting bins. Camera Photo DSCN1174.

Photo Log – WestRock Anchorage Recycling Facility.



Photo #:05

Description: Photo from inside processing area. Camera Photo DSCN1175.

Photo #:06

Description: Facing north, photo the facility access road (Rosewood St.) Camera Photo DSCN1176.

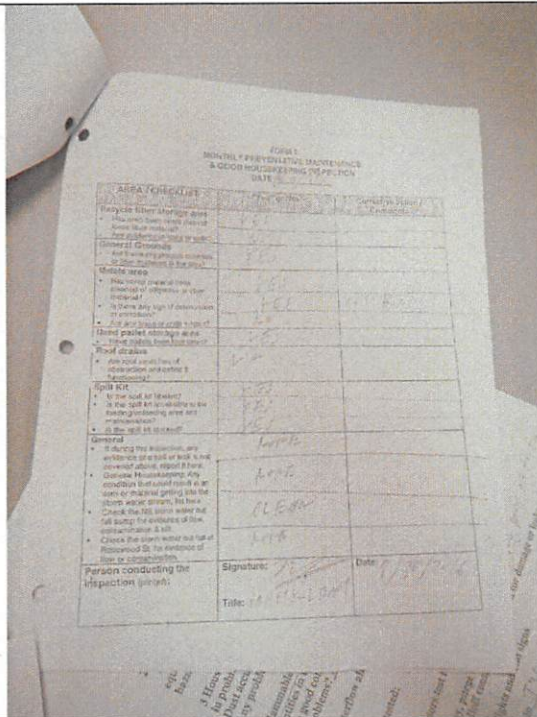


Photo #:07

Description: Photo of a monthly preventative maintenance and good housekeeping inspection. The one in this photo is from August 30, 2016.

Attachment C

WestRock Recycling Center & ADEC Monitoring Email

Randy Virgin

From: Robert Dinehart
Sent: Friday, August 09, 2013 8:54 AM
To: Rypkema, James (DEC)
Cc: Randy Virgin
Subject: RE: RockTenn CP, LLC Recycling Facility

Jim,

Thank you. We will adjust our SWPPP and our calendar of environmental tasks. If our operating conditions are modified that would cause our facility SI Code to change, we will notify you. But I don't see any reason why that should occur in the near future.

Thank You,

Bob Dinehart

Environmental Services Manager
RockTenn
3950 Shackleford Road
Duluth, GA 30096
Office: (770) 326-8142
Cell: (404) 915-5863
Fax: (770) 326-8159
bdinehar@rocktenn.com

From: Rypkema, James (DEC) [mailto:james.rypkema@alaska.gov]
Sent: Thursday, August 08, 2013 7:13 PM
To: Robert Dinehart
Subject: RE: RockTenn CP, LLC Recycling Facility

Mr. Dinehart,

Thank you for your inquiry. Per the information you provided you would not need to submit a MDMR if your facility falls under SIC 5093, and receives only source-separated materials and does not fall under any other categories required by Part 6.2 or 6.3 of the MSGP that are required to perform analytical monitoring; in reference to Section 8.N.3.3 Recycling Facilities: Source-Separated Materials (pg. 100), and Section 8.N.6: Sector-Specific Benchmarks (pg. 102).

Note that there are visual monitoring requirements and annual reporting requirements you would be responsible for. See Section 7 of the MSGP.

If you have any further questions, please contact me.

Jim Rypkema
Section Manager, Storm Water & Wetlands
Wastewater Discharge Authorization Program
Div of Water, Alaska Dept of Environmental Conservation
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